

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MISCELLANEOUS WAREHOUSEMEN'S LOCAL 781 HEALTH & WELFARE FUND,)	CIVIL ACTION
)	
<i>Plaintiff,</i>)	Case No. 17 CV 7800
)	
v.)	Honorable Judge Wood
GLASS MANAGEMENT SERVICES, INC., <i>an Illinois Corporation, d/b/a</i>)	Magistrate Judge Cole
GLASS & MIRROR AMERICA)	
)	
<i>Defendant.</i>)	

JOINT CERTIFICATION TO DEFER INITIAL DISCOVERY DEADLINE

NOW COMES Plaintiff, Miscellaneous Warehousemen's Local 781 Health & Welfare Fund, and Defendant, Glass Management Services, Inc., an Illinois corporation, *d/b/a* Glass & Mirror America (collectively, the "Parties"), by and through their respective counsel, and pursuant to this Court's Standing Order Regarding Mandatory Initial Discovery, and hereby file the Parties' Joint Certification to Defer Initial Discovery Deadline. In support of this Certification, the Parties state as follows:

1. On October 30, 2017, Plaintiff brought this action under on Section 502(e)(1) and (2) and 515 of the Employee Retirement Income Security Act of 1974 ("ERISA"), as amended, 29 U.S.C. §1132 (e)(1) and (2) and 1145, seeking payment of allegedly delinquent fringe benefit contributions covering the period January 1, 2014, through June 1, 2017, plus liquidated damages, interest and auditor and attorneys' fees and costs.
2. On December 29, 2017, Defendant answered Plaintiff's Complaint, requiring the Parties' initial discovery responses to be served on or before January 29, 2018.

3. Defendant is in the process of preparing challenges to the audit findings for consideration by Plaintiff.

4. The Parties are working toward settlement and have a good faith belief that this case will be resolved within thirty days of the due date for their initial discovery responses.

5. The Parties agree to extend the initial discovery deadline thirty (30) days, as permitted under the Court's Standing Order Regarding Mandatory Initial Discovery.

Dated: January 26, 2018

Respectfully submitted,

MISCELLANEOUS WAREHOUSEMENS
LOCAL 781 WELFARE FUND

By: /s/ Patrick N. Ryan

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GLASS MANAGEMENT SERVICES, INC.,
d/b/a GLASS & MIRROR AMERICA

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